

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
)
PUBLIC UTILITIES COMMISSION) DOCKET NO. 2008-0273
)
Instituting a Proceeding to Investigate the)
Implementation of Feed-in Tariffs.)
)
_____)

FILED
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PUBLIC UTILITIES
COMMISSION

**TAWHIRI POWER LLC'S
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY,
INC./CONSUMER ADVOCATE; DEPARTMENT OF BUSINESS, ECONOMIC
DEVELOPMENT AND TOURISM; CLEAN ENERGY MAUI LLC
and ZERO EMISSIONS LEASING LLC**

AND

CERTIFICATE OF SERVICE

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DEVELOPMENT AND TOURISM; CLEAN ENERGY MAUI LLC;
and ZERO EMISSIONS LEASING LLC**

Pursuant to the Commission's Order Approving the HECO Companies' Proposed Procedural Order, as Modified, filed herein on January 20, 2009, Tawhiri Power LLC hereby submits the following Information Requests to the Hawaiian Electric Company, Inc./Consumer Advocate; Department of Business, Economic Development and Tourism; Clean Energy Maui LLC; and Zero Emissions Leasing LLC.

Respectfully submitted.

DATED: Honolulu, Hawaii, March 4, 2009.



HARLAN Y. KIMURA

Attorney for Tawhiri Power LLC

DOCKET NO. 2008-0273

**TAWHIRI POWER LLC'S INFORMATION REQUESTS TO
HAWAIIAN ELECTRIC COMPANY, INC./CONSUMER ADVOCATE;
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM;
CLEAN ENERGY MAUI LLC; and ZERO EMISSIONS LEASING LLC**

INSTRUCTIONS:

In order to expedite and facilitate Tawhiri Power LLC's ("TPL") review and analysis in the above matter, the following is requested:

1. For each response, the Hawaiian Electric Company, Inc./Consumer Advocate ("HECO/CA")¹, Department of Business, Economic Development and Tourism ("DBEDT"), Clean Energy Maui LLC ("CEM"), and Zero Emissions Leasing LLC ("ZEL"), should identify the person(s) responsible for preparing the response(s), as well as the witness(es) who will be responsible for sponsoring the response(s), should there be an evidentiary hearing in this Docket;
2. Should HECO/CA, DBEDT, CEM, and/or ZEL, claim any information is not discoverable for any reason:
 - a. State the claimed privilege(s) and objection(s) to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. Specify the conditions HECO/CA, DBEDT, CEM, or ZEL, will permit disclosure to TPL (e.g. protective agreement, review at business offices, etc.); and
 - d. Should HECO/CA, DBEDT, CEM, or ZEL, claim a written document or electronic file is not discoverable, in addition to complying with subparagraphs 2.a-c above, identify each document or electronic file, or portions thereof, HECO/CA, DBEDT, CEM, or ZEL, as the case may be, claims is privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

¹ With respect to the references to "HECO" and/or "HECO/CA", the same includes Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc. and Maui Electric Company, Limited.

TPL-IR-8 (to DBEDT):
(reference SOP at 14)

Please explain the "rules on curtailment" that you are proposing? Would your rules include existing renewable Independent Power Producers ("IPPs")?

TPL-IR-9 (to CEM and ZEL):
(reference CEM SOP at 3)
(reference ZEL SOP at 3)

If utility generation is allowed to participate in Feed-in Tariffs (collectively "FiT"), are you proposing any safeguards to avoid a potential conflict of interest or appearance of conflict of interest with that arrangement? If so, please explain in detail what would be those safeguards? If not, please explain how the integrity of the FiT will be maintained under that scenario.

TPL-IR-10 (to HECO/CA):

HECO has acknowledged distribution-level generation that is not curtailable may increase the curtailment of transmission-level renewables. In that event:

- a. Does HECO/CA intend to propose a solution to avoid and/or remedy such situations? If so, what is the proposal and when would such proposal be made?
- b. Would HECO/CA support postponing FiT implementation in systems with high penetration levels of renewables until this issue is resolved?
- c. Would HECO/CA support convening a meeting to resolve this issue?

TPL-IR-11 (to HECO/CA):

Please provide documentation of the following examples you cited in your response to Haiku Design & Analysis' Information Request No. 5 To HECO ("HDA/HECO-IR-5") as evidence of the measures already taken by HELCO to improve its "ability to effectively integrate existing and new variable generators" with respect to:

- a. "modifications to the HELCO AGC system to reduce the responsiveness of the system to short term fluctuations in power output of as-available generation to avoid overcompensating for these types of fluctuations;"
- b. "modifications and tuning of the control systems for HELCO generating units to increase their responsiveness to respond to fluctuations in as-available generation output;"

- c. "increasing the regulating reserve carried on the HELCO grid to provide greater upward ramping capability of online generators to respond to sustained drop offs of as-available generation;"
- d. "HELCO transmission projects which have increased east-to-west transmission capacity that also allow for greater operating flexibility of dispatchable generation to reduce excess energy and curtailment of as-available generation;"
- e. "a HELCO system stability study to define the minimum amount of steam generation (i.e., generation with higher rotational inertia) that is required to run at all times to ensure the stability of the system during typical emergency events such as transmission system faults, thus allowing better understanding and quantification of the amount of wind and PV energy (i.e., generation with very little to no rotational inertia) that the system can reliably accommodate;"
- f. the system studies being undertaken "to better understand what additional modifications are needed in operating practices and existing generation and T&D equipment, as well as the types and attributes needed from new demand response programs and generating units in order to increase the grid's ability to integrate as available generation"; and
- g. The study being initiated "to research and develop wind forecasting capabilities that predicts periods of higher risk for large and rapid wind ramping events using available meteorological data available for the Hawaii Island system."

TPL-IR-12 (to HECO/CA):

Please provide documentation of the following example you cited in your response to HDA/HECO -IR-5 as evidence of the measures already taken by HECO to improve it "ability to effectively integrate existing and new variable generators":

"[t]he Oahu 'big wind' implementation studies that commenced with the signing of the HCEI Energy Agreement [that] are scoped to provide technical and operational solutions to the integration of grandfathered (from Competitive Bidding) as-available renewable IPP proposals, up to 100 MW

of renewable IPP projects from HECO's 2008 Request For Proposals, and up to 400 MW of wind energy imported from Molokai and/or Lanai.”

TPL-IR-13 (to HECO/CA):

Assuming existing renewable energy contracts may continue to be paid at avoided energy costs after FiT implementation had commenced, please answer the following:

- a. Did HECO conduct simulation studies of the impact of different levels of FiT generation penetration on posted avoided costs?
- b. If the answer to TPL-IR-13.a is in the affirmative, please provide documentation of the methodology employed to calculate the avoided costs, the results attained and the conclusions reached.
- c. If the answer to TPL-IR-13.a is in the negative, when do you intend to conduct such simulation studies?

CERTIFICATE OF SERVICE

The foregoing Information Requests were served on the date of filing by hand delivery
or electronically transmitted to the following Parties:

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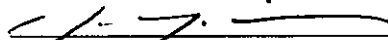
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DATED: Honolulu, Hawaii, March 4, 2009.


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